

EXHIBIT 1

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2 would interfere with your ability to remember
3 or tell the truth today?

4 A. No.

5 Q. Can you think of any reason why you
6 would not be not be able to answer my
7 questions fully and truthfully today?

8 A. No.

9 Q. What was your position at Lawrence
10 Hospital?

11 A. I was senior social worker.

12 Q. Did you work a particular shift or
13 have particular hours?

14 A. I worked from 8:00 a.m. to 4:00
15 p.m.

16 Q. Were those your hours of work for
17 the entire time that you were employed?

18 A. Yes.

19 Q. When did your employment start with
20 Lawrence Hospital?

21 A. It started on March 2006.

22 Q. And at the time your employment was
23 terminated, who was your supervisor?

24 A. My supervisor was Cathy Magone.

25 Q. How long had Ms. Magone been your

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2 immediate supervisor prior to your
3 termination?

4 A. About four months.

5 Q. Do you recall the date when she
6 became your immediate supervisor?

7 A. I think it was in June or July.
8 I'm not sure.

9 Q. June or July of '06?

10 A. Of '06.

11 Q. Was there anyone else that you
12 reported to during your employment at
13 Lawrence Hospital?

14 A. Yes, Diane Lance.

15 Q. And over what he period of time did
16 you report to Ms. Lance?

17 A. From March 2006 until somewhere
18 around June or July '06, when she left.

19 Q. Was there anyone else who was your
20 immediate supervisor while you were at
21 Lawrence?

22 A. No.

23 Q. Who gave you assignments while you
24 were employed at Lawrence?

25 MS. NICAJ: Objection.

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2 You can answer.

3 A. My assignments came from various
4 sources. They came off a daily run of
5 patients that was taken off the fax machine.
6 They were spontaneously given to me by the
7 case managers. They were spontaneously given
8 to me by nurses, by doctors. That's how I
9 got my assignments for the day.

10 Q. What form did these assignments
11 take?

12 A. I would be called either on my
13 phone or my beeper or in person, or even just
14 walking through the halls. I would be
15 stopped and asked to do something by someone
16 who needed me.

17 Q. Was there a typical or regular task
18 that you were asked to perform?

19 A. The tasks were assisting the case
20 manager, basically assisting the case
21 managers in providing discharge planning. My
22 piece -- in particular, my piece was the
23 behavioral health piece.

24 Q. And what was the behavioral health
25 piece?

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2 A. That was working with families and
3 patients and working through emotional
4 issues, psychiatric issues, working through
5 problems that arose within families and
6 patients. Just helping them get through the
7 hospital stay.

8 Q. Who, if anyone, provided you
9 evaluation or feedback on your performance
10 while you were at Lawrence Hospital?

11 A. Cathy Magone and Diane Lance, when
12 she was there.

13 Q. Why were you fired?

14 A. Why was I fired? I was told when
15 they terminated me on October 5th that I was
16 not a good fit, that there were attendance
17 issues, punctuality issues, there were issues
18 relating to the general work.

19 Q. Do you have any reason to doubt
20 what you were told?

21 A. Yes.

22 Q. What are those reasons?

23 A. I performed the job duties as
24 delineated by Ms. Magone and Ms. Lance to the
25 best of my ability. I was always on time. I

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2 worked many hours overtime. So there was not
3 a punctuality issue. I was very cohesive
4 with my co-workers. There were problems in
5 the beginning, which I believe had been
6 worked out. And I was a loyal and
7 trustworthy employee to Lawrence Hospital.

8 Q. What do you believe to be the
9 reason why you were fired?

10 A. I believe that I went to HR to
11 discuss an issue of ageism, and I believe
12 from that point on my relationship with Cathy
13 Magone had changed, and I believe that I was
14 let go in retaliation for going to HR.

15 Q. What's your basis for believing
16 that?

17 A. My basis for believing that, the
18 ageism piece is related to a comment that
19 Cathy Magone made to me on August the 13th,
20 '06. And I believe that once I went to HR,
21 Cathy Magone felt I was out of order, or out
22 of line perhaps, and began to find reasons to
23 let me go and not pass my probation.

24 Q. But what is the basis for your
25 belief that Cathy Magone felt you were out of

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2 also, which I don't have a copy of because I
3 was never given a copy of it.

4 Q. When was the date of this other
5 one?

6 A. Perhaps April of '06. I don't
7 recall the exact date.

8 MR. KEIL: Can the court reporter
9 please mark this as Defendants' Exhibit
10 A.

11 (Defendants' Exhibit A, Big Heart
12 award nomination, marked for
13 identification, as of this date.)

14 Q. Ms. Newmark, I'm going to show you
15 what's been marked as Defendants' Exhibit A.

16 Do you recognize this document?

17 A. Yes.

18 Q. Is this one of the Big Heart award
19 nominations that you were referring to?

20 A. Yes, it is.

21 Q. Was this for the April -- does this
22 reflect the April nomination?

23 A. Yes, it does.

24 Q. So is this the Big Heart award you
25 received a copy of?

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2 **made about her?**

3 A. Can you repeat that?

4 MR. KEIL: Can you read that back,
5 please?

6 (Whereupon, the requested portion
7 was read back by the court reporter.)

8 A. Not that I can recall. Excuse me,
9 other than she denied making that statement.

10 **Q. How does that -- how do you see**
11 **that supporting your belief?**

12 A. Because she denied saying something
13 to me that prompted me to go to HR, and I
14 believe that she was angry with me for going
15 to HR and for bringing up something that she
16 denied happened. I don't know if I'm
17 answering exactly the way you would like me
18 to.

19 MS. NICAJ: Don't worry about the
20 way he would like you to. You answered
21 the question.

22 **Q. Your obligation is to tell the**
23 **truth to the best of your recollection.**
24 **That's all I'm looking for.**

25 A. Okay.

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2 Q. What did Cathy Magone say or do
3 that made you believe that she was angry with
4 you because you had complained?

5 MS. NICAJ: Objection.

6 You can answer.

7 A. Her entire demeanor and attitude
8 towards me had changed. I was overlooked in
9 several instances where other people weren't
10 for various things that were going on in the
11 hospital. Ms. Magone, just her whole
12 attitude changed towards me. That's the
13 basis of my belief that she was angry with me
14 for going to HR with something that she said.

15 Q. When you say that her entire
16 demeanor and attitude changed, what do you
17 mean by that?

18 A. She wouldn't meet with me as
19 frequently. She wouldn't make eye contact
20 with me. Her whole demeanor changed. We had
21 something at Lawrence Hospital called a Big
22 Heart and a Little Heart, which was when you
23 were nominated -- you were nominated by
24 patients or staff for deeds well done.

25 I received two of them. Cathy

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2 A. Yes, I received a copy of this one
3 and it was posted on a board.

4 **Q. Which board was it posted on?**

5 A. The secretary's office. There was
6 a general board for postings.

7 **Q. In the department of case**
8 **management and social work?**

9 A. Yes, that's correct.

10 **Q. So the nomination that you said you**
11 **believe may have been in September, is the**
12 **one you didn't receive a copy of?**

13 A. That's correct.

14 **Q. Do you know who submitted that**
15 **nomination?**

16 A. Yes, I do. It was a co-worker. It
17 was, I believe, I'm not sure, I believe it
18 was a nurse's aide.

19 **Q. Do you know the name of that**
20 **individual?**

21 A. I don't.

22 **Q. How did you find out that this one**
23 **had been submitted, the September nomination?**

24 A. Actually, my daughter worked for
25 the department of excellence at Lawrence

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2 Hospital, and all of the Big Heart and Little
3 Heart awards were given through her
4 department. And so when she received it, she
5 let me know that I received this.

6 Q. Did she let you know you had
7 received it before or after your termination
8 from employment?

9 A. Before.

10 Q. Approximately how long before?

11 A. Approximately September,
12 mid-September. I'm not sure.

13 Q. You're not sure?

14 A. I'm not sure. I do have
15 documentation at home in regard to it.

16 Q. What sort of documentation do you
17 have?

18 A. I have a letter that was given --
19 that was sent from the department of
20 excellence to, I believe to Cathy Magone.

21 Q. And you testified earlier that you
22 said that one of the ways in which you
23 perceived Cathy Magone's demeanor and
24 attitude to change was that she met with you
25 less frequently?

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2 A. She met with me less frequently.
3 She just didn't have the same rapport with me
4 that she had on the onset of my working at
5 Lawrence Hospital.

6 Q. How would you describe your rapport
7 with Cathy Magone at the beginning of your
8 work?

9 A. At the beginning, it was amicable.
10 I really didn't have much to do with her
11 because I was reporting directly to Diane
12 Lance, but it was cordial. It was not bad.

13 Q. Did your working relationship with
14 Cathy Magone stop being cordial at some
15 point?

16 A. Yes.

17 Q. When?

18 A. I would have to say after I went to
19 HR.

20 Q. Why do you say that?

21 A. Because it's the truth. Because
22 that's what happened.

23 Q. What did Cathy Magone do after you
24 went to HR that you would characterize as a
25 change in her being cordial to you or not?

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2 MS. NICAJ: Objection.

3 You can answer.

4 A. She, as I said before, she stopped
5 making eye contact with me. She stopped
6 meeting with me. She was rather dismissive
7 with me. I'd ask a question or I'd raise an
8 issue and she would ignore it in meetings, in
9 staff meetings.

10 **Q. What questions did you ask that she**
11 **ignored?**

12 A. Just general comments, or I just
13 made a general comment or asked a question
14 and she just didn't answer it, or just went
15 on to something else.

16 **Q. What would be an example of a**
17 **comment you made?**

18 A. Maybe something in regard to a
19 patient or in regard to something we were
20 doing, and I would make a comment, and in the
21 beginning she would be very responsive to me
22 and she became less responsive.

23 **Q. When you say she met with you less**
24 **frequently, you're referring to one-on-one**
25 **meetings?**

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2 A. Yes.

3 Q. Or some other?

4 A. One-on-one.

5 Q. At the beginning of your employment
6 at Lawrence while Diane Lance was your
7 supervisor, how often did you meet with Cathy
8 Magone?

9 A. I didn't.

10 Q. Not at all?

11 A. No, no, except for -- we had what
12 they called lineup in the morning, which is a
13 Ritz Carlton prototype where everyone lines
14 up and you discuss what's going to be done
15 for the day. That occurred at 10:00 a.m. in
16 the morning.

17 Q. 10:00 a.m. every day?

18 A. Yes.

19 Q. That continued after Diane Lance
20 left?

21 A. Yes, it was a mandate at the
22 hospital.

23 Q. After Diane Lance left, how often
24 did you meet with Cathy Magone?

25 A. We all met with Cathy Magone in the

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2 mornings. And she would meet with me
3 sporadically. There was not an agenda set or
4 a set time where she would meet with me. If
5 she needed to ask me a question, she would
6 ask me to come up and ask me a question. It
7 wasn't formal.

8 Q. Did it happen at least once a week?

9 A. Yes.

10 Q. At least four times a week?

11 A. Perhaps.

12 Q. Were there weeks when it happened
13 more often than that?

14 A. Not really. We would also see each
15 other in the hallways or on a unit.

16 Q. After you complained to Human
17 Resources, how often did you meet with Cathy
18 Magone?

19 A. I don't think I did meet with
20 Cathy.

21 Q. Not once?

22 A. Afterwards, let me just get my --
23 not for any specific reason. We would meet
24 in the mornings at lineup or we would meet on
25 a unit where she would ask me how things are,

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2 **Hospital?**

3 A. On October 5, 2006.

4 **Q. What time of day did you find out?**

5 A. At exactly 3:30. Correction. I
6 can give you an approximation of 3 o'clock.

7 **Q. 3 o'clock is your best**
8 **recollection?**

9 A. That's my best recollection,
10 correct.

11 **Q. Where were you when you found out**
12 **you were going to be fired?**

13 A. I was in the intensive care unit.

14 **Q. And what were you doing at the**
15 **time?**

16 A. I was working with a psychotic
17 patient who needed discharge to a facility,
18 an inpatient mental health facility. I had
19 been working on that case for about an hour.

20 **Q. And how did you find out that you**
21 **were going to be fired?**

22 A. I went to -- I was in the ICU. I
23 got a call on my beeper. I returned the call
24 to Cathy Magone. She said, "Please come up
25 to my office."

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2 I said, "Do you need me right now?
3 I'm working with this case that has to be
4 transferred to an inpatient psychiatric
5 facility."

6 She said, "You are no longer on the
7 case. Nicole Serra is. Come up to my office
8 immediately."

9 Q. Did you do that?

10 A. I did.

11 Q. Who was present at Cathy Magone's
12 office when you arrived?

13 A. Pat Orsaia.

14 Q. And Cathy Magone?

15 A. Yes, of course.

16 Q. And how did the meeting begin?

17 A. I sat down, Pat Orsaia said -- I
18 can't say verbatim, but she said that we were
19 meeting because I was not a good fit at
20 Lawrence Hospital, and they were terminating
21 my employment there.

22 Q. You don't recall the precise words
23 that Ms. Orsaia used?

24 A. Not exactly, but that's as close
25 as --

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2 Q. Did Ms. Orsaia say anything else?

3 A. She proceeded to -- actually, I was
4 in shock, so I may not have heard a lot of
5 what she said, but she proceeded to tell me
6 that it wasn't working out and that I was to
7 get my belongings together, empty my office,
8 and leave the premises immediately, and that
9 I had an hour to do that.

10 Q. Did she say anything else?

11 A. Not that I recall. She gave me
12 some paperwork. She gave me termination
13 letters and some other paperwork that she
14 wanted me to see. She said I was entitled to
15 COBRA. She went over the basics of, I guess
16 what people do when they're fired. I have
17 never been fired before, so I don't know what
18 the procedure is.

19 Then Cathy Magone kind of threw my
20 evaluation at me. She pushed it across the
21 desk. Pat Orsaia asked me to read it. I
22 asked her if I could read it when I left. I
23 believe I did look at it, I flipped through
24 it. There was some exchange of words, you
25 know, between Cathy and Ms. Magone and Pat

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2 Orsaia, and then I was told that Cathy Magone
3 would escort me out of the building.

4 At that point, I asked if a
5 security guard could escort me because I
6 didn't trust her.

7 Q. Why didn't you trust her?

8 A. I just didn't.

9 Q. No particular reason?

10 A. I didn't trust her. I felt she was
11 very volatile at times with other people.
12 And I didn't want her to escort me out of the
13 building, and I thought that the formality
14 would be a security guard to take me back to
15 my office.

16 Q. When you say you had seen Cathy
17 Magone be volatile with other people, what
18 are you referring to?

19 A. Her staff.

20 Q. Which staff members?

21 A. All the case managers.

22 Q. Every single one?

23 A. Just about.

24 Q. How many times did you see this
25 happen?

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2 A. Quite often.

3 **Q. Was it every day?**

4 A. I couldn't say every day.

5 **Q. Was it every week?**

6 A. I didn't see her that much, but
7 when I did see her on the units with people,
8 she was quite demanding.

9 **Q. When you say volatile, you're**
10 **saying she was quite demanding?**

11 A. Demanding and maybe volatile is a
12 little strong, but she would want her way and
13 insist on having things her way.

14 **Q. How long did the meeting last?**

15 A. That meeting lasted about ten
16 minutes.

17 **Q. How did it end?**

18 A. I got up, I took my paperwork with
19 me, I proceeded to go to the elevator to go
20 back to my office to empty the contents of my
21 office, Cathy Magone escorted me. Pat Orsaia
22 told me that a security guard would not
23 escort me, that Cathy Magone would escort me.

24 I thought that was very unusual,
25 but I was kind of reeling from being fired,

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2 that she was a fucked up manager, and that
3 was after my employ there. I had an hour to
4 get out. It was 4:15. And that was it.

5 Q. It took you approximately an hour
6 to pack up?

7 A. Yes.

8 Q. How did Cathy Magone respond to the
9 words you used?

10 A. She turned around and said, "Nice
11 Carole, very nice."

12 Q. When you said to her, "You're a
13 fucked up manager," was there anything
14 specific that you're referring to?

15 A. Just the way she managed her people
16 out of fear. I'm a very gentle person and I
17 don't operate that way, so I found it
18 unusual. I found it unusual how she --

19 MS. NICAJ: Raise your voice.

20 Q. Is there anything you wanted to add
21 to that?

22 A. Add to what?

23 Q. Your prior answer. I didn't know
24 if you had been interrupted.

25 A. No.

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2 Q. Was there anything in particular
3 you were referring to when you said, "You're
4 a fucked up person"?

5 A. It was just a release of emotion, I
6 guess. It was a very tense hour for me.

7 Q. When did you first start to believe
8 that Cathy Magone was a bad manager?

9 A. I got information prior to
10 accepting the position that she was a very
11 tough manager and not fair. I, being the
12 person that I am, I thought I would come to
13 my own conclusions about anyone that I met.
14 So it was hearsay. And that's the first time
15 that I heard certain things about Cathy
16 Magone.

17 Q. But my question is, when did you
18 first start to believe it?

19 A. About two months into my employ
20 there.

21 Q. So approximately May, late May?

22 A. About that.

23 Q. Who had you received this prior
24 information from?

25 A. Denise Galloway.

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2 your own conclusions about Cathy Magone as a
3 manager approximately late May of 2006?

4 A. Yes.

5 Q. What happened that made you form
6 that belief?

7 A. I was just observing, which is part
8 of my job and part of what I do as a social
9 worker and a psychotherapist, I observed how
10 she treated people. I observed how people
11 felt in her presence. I heard people talking
12 about her and how frightened they were of
13 her.

14 Q. Who did you perceive to be
15 frightened of Cathy Magone?

16 A. Oh, there is a list of people, and
17 I hope that I can remember all of their
18 names.

19 Q. Do your best.

20 A. Kitty -- these are all case
21 managers. Kitty, Lori Bachmann, Barbara.
22 There's another case manager who left. I
23 can't recall her name. These were people who
24 have been at Lawrence Hospital for quite some
25 time, and then there were new people who had

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2 -- who hadn't really made up their mind one
3 way or the other about how they felt about
4 her. There were a lot of new people, but
5 those were the people.

6 Q. What did Cathy Magone do
7 specifically that led you to conclude that
8 she managed through fear?

9 A. She was very demanding, very
10 demeaning in other people's presence on
11 units. She demanded to know what was going
12 on. That's part of her job, but in my
13 opinion, there is a way of relating to people
14 and she was forceful, demeaning at times,
15 dismissive of other people when she had
16 something to say.

17 Q. How old is the case manager? You
18 mentioned Kitty, how old is she?

19 A. Ballpark, late 50s.

20 Q. How old is Lori Bachmann?

21 A. Lori Bachmann was well into her
22 60s, also worked there for maybe 30 years.

23 Q. How old was Barbara?

24 A. 40s maybe.

25 Q. Did you ever discuss these

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2 **them?**

3 A. Not at the beginning, I didn't,
4 because I felt that it's in my nature to
5 allow people to present themselves as who
6 they are. And I always give people a chance.

7 And I don't come -- I'm not
8 reactive and I don't come to rash decisions
9 and I don't really take people's, you know,
10 what someone thinks about someone, I kind of
11 put it somewhere in the back of my head and
12 come to my own conclusions about people.

13 **Q. When did you first express your**
14 **concerns about Cathy Magone to someone else**
15 **at Lawrence Hospital?**

16 A. Ballpark, maybe, June.

17 **Q. You don't remember the exact date?**

18 A. I don't.

19 **Q. Who did you express these concerns**
20 **to?**

21 A. To Lori Bachmann, to Nicole Serra
22 to Denise Galloway, via telephone.

23 **Q. Is there anyone else?**

24 A. No, because I was busy working and
25 I don't like to get into gossip on the job,

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2 you know, it's not something that I do.

3 Q. What did you say to Nicole Serra
4 about your perceptions of Cathy Magone?

5 A. At what time?

6 Q. At the time you started?

7 A. At the time I started, I didn't
8 really have any opinions of Cathy one way or
9 the other. I didn't have much to do with
10 her. Most of my interactions were with Diane
11 Lance, so she seemed okay, I guess. That's
12 what I told her.

13 Q. Allow me to clarify.

14 When did you first express your
15 concerns to Nicole Serra -- you said there
16 was a time when you started expressing them
17 to Nicole Serra.

18 A. Yeah.

19 Q. When was that?

20 A. Maybe the end of July, August.
21 More so August than July.

22 Q. What did you say to Nicole Serra at
23 that time?

24 A. That I made some observations, we
25 both made observations about Cathy Magone and

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2 her management style and how dichotomous it
3 was to -- how we did our job as social
4 workers, and we had a very humane bend to
5 what we did, and it seemed to be very
6 business and very money-oriented when, you
7 know, when Magone talked about certain
8 things. There was no regard for patients or
9 their situations or family situations.

10 Q. Was that one conversation you had
11 with Nicole Serra?

12 A. It was probably several.

13 Q. Over what span of time, you said
14 beginning, end of July or August and lasting
15 how long?

16 A. It wasn't constant. It was when
17 anything came up that merited talking about
18 it at lunchtime or on a break.

19 Q. Did Nicole Serra say anything to
20 you about her observations of Cathy Magone?

21 A. Yes, she agreed with me. She
22 agreed we're very different. The way we
23 perform our work is very different from the
24 way nurses and managers perform their work.

25 Q. Was there anything else the two of

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2 **you discussed about Cathy Magone?**

3 A. I recall towards the end or middle
4 of September telling Nicole that I felt that
5 she held me to a different standard from
6 other people, and that's when I began to feel
7 that things were changing, really changing,
8 that she was kind of ignoring me and just
9 acting differently towards me than she had in
10 the beginning.

11 **Q. So you felt that began in late**
12 **September?**

13 MS. NICAJ: Objection.

14 You can answer.

15 A. August, September. When you have a
16 conversation with someone you don't really
17 jot down the dates, so I can't say for sure.

18 **Q. I'm not asking about the date of**
19 **your conversation. I'm asking about the date**
20 **when you felt that things -- the date that**
21 **you thought that Cathy Magone's treatment of**
22 **you changed. I guess there are two questions**
23 **there.**

24 **The first is: When did you form**
25 **the belief that her treatment of you had**

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2 **changed?**

3 A. After I had gone to HR.

4 Q. How long after you had gone to HR
5 did you form that belief?

6 A. Immediately.

7 Q. The same day?

8 A. I wouldn't say the same day. Maybe
9 that week.

10 Q. What day did you go to Human
11 Resources?

12 A. I went to Human Resources on August
13 15, 2006.

14 Q. Do you recall whether there were
15 any union elections scheduled that week at
16 Lawrence Hospital, were you aware of that?

17 A. No.

18 Q. Were you aware of Pat Orsaia's
19 vacation schedule in August?

20 A. Not in detail, no. I know that
21 after I met with her she said there were
22 several courses of action. I could either
23 meet with Cathy Magone and discuss my
24 feelings. I could meet -- or I could meet
25 with the two of them.

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2 words that Pat Orsaia said to you in this
3 meeting about your options about how to
4 proceed?

5 A. She said I could meet with Cathy
6 Magone alone and try to work this out. I
7 didn't feel that I could trust Cathy Magone
8 to work things out with me. Because I saw
9 the way she treated other people and I didn't
10 want to be treated that way, or we could meet
11 together, the three of us, Pat, Cathy and
12 myself, and that's what I opted for.

13 Q. When you communicated your concerns
14 about what Cathy Magone had said to Pat
15 Orsaia, what were the exact words that you
16 had used in speaking to Ms. Orsaia?

17 A. Can you repeat that?

18 Q. What were the exact words you used
19 to communicate your concern to Pat Orsaia
20 about what Cathy Magone had said?

21 A. What I said to her was that I was
22 called in to Cathy Magone's office, I believe
23 it was on the 15th of August, '06, and that
24 she had informed me that Nicole Serra was
25 chosen for the -- to be the social worker

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2 And that's when she said to me,
3 "Nicole Serra is younger than you are and can
4 take things in better than you can or can
5 absorb things better than you can" -- not
6 absorb.

7 "Nicole Serra is younger than you
8 are and can take things in better than you
9 can."

10 Q. Those are the exact words that
11 Cathy Magone said to you?

12 A. To the best of my recollection.

13 Q. And those are the exact words you
14 communicated to Pat Orsaia?

15 A. Yes, I did. And I told Pat Orsaia
16 that I felt that this was ageism.

17 Q. How did Ms. Orsaia respond?

18 A. She didn't really. She just
19 listened to me. I think she said something
20 like, are you sure that's what was said?

21 I said, "Yes, I'm absolutely sure.
22 Why would I come here and tell you this if it
23 were not true? Why would I do that?"

24 Q. Was there anything else that you
25 said to Ms. Orsaia during that meeting?

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2 A. I asked her when my evaluation
3 would be coming. I think it was close to the
4 time when my evaluation was due. She said
5 she couldn't answer that at the time. She
6 didn't know.

7 Q. Was there anything else?

8 A. I don't recall at this point.

9 Q. Apart from what you already
10 testified to, did Pat Orsaia say anything
11 else to you during this meeting?

12 A. She said that sometimes people
13 filter things out differently. That people
14 filter things differently and that perhaps I
15 didn't understand what she meant.

16 I said I think I understood what
17 she meant, but I would consider the fact that
18 people do filter things out differently.

19 Q. Did Pat Orsaia say anything else
20 during this meeting?

21 A. No.

22 Q. Did you?

23 A. I asked when we could meet, and she
24 said she would set something up, and then I
25 believe there were vacations all around, both